UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

No. 12 CV 8696 (NRB)

VS.

ECF Case

CHINA NORTHEAST PETROLEUM HOLDINGS LIMITED et al.,

Defendants,

RESPONSE OF WANG HONGJUN TO MOTION FOR LIMITED RELIEF FROM DISCOVERY STAY AND FOR ISSUANCE OF SUMMONSES

Defendant Hongjun Wang does not oppose the motion of the United States Securities and Exchange Commission. To the extent the Court grants any relief from the discovery stay, however, Mr. Wang reserves all rights to make objections to any interrogatory or document request propounded.

Dated: August 4, 2014 Respectfully submitted,

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

s/ Joseph N. Akrotirianakis

By:

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